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Attorneys for Defendant
JQD, LLC dba PRO SOLUTIONS,
A California limited company,

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT**

CHRISTOPHER D. TERRELL, an
individual,

Plaintiff,

v.

JQD, LLC dba PRO SOLUTIONS, a
California limited liability company,

Defendants.

Case No.: 3:17-CV-05626 RS

**STIPULATION TO TERMINATE
LITIGATION AND ~~[PROPOSED]~~ ORDER**

Plaintiff CHRISTOPHER D. TERRELL and Defendant JQD, LLC dba PRO
SOLUTIONS, come before the Court and stipulate as follows:

In the mutual interest of terminating this litigation, Defendant agrees to waive its pending
Bill of Costs as prevailing party (Dkt. #70), in consideration and exchange for plaintiff's
agreement to waive his rights to appeal in this case, including the right to appeal the Court's
rulings on the parties' motions for Summary Judgment and Partial Summary Judgment.

Accordingly, Defendant withdraws its Bill of Costs.

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IT IS SO STIPULATED.

Date: January 23, 2019

DELTA LAW GROUP

By: /s/ JIM G. PRICE

Jim G. Price
Attorneys for Plaintiff
Christopher D. Terrell

Date: January 23, 2019

WILSON ELSE MOSKOWITZ EDELMAN &
DICKER LLP

By: /s/ FRANCIS TORRENCE

Francis Torrence
Donald P. Sullivan
Attorneys for Defendant JQD, LLC dba Pro
Solutions, a California limited company

ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED

Dated: January 23, 2019


RICHARD SEEBORG

RICHARD SEEBORG
United States District Court Judge